

DELEGATION AND TRAINING OF NON-MEDICAL/UNLICENSED SCHOOL STAFF/EMPLOYEES

Unlicensed personnel staff / non-medical personnel staff are used interchangeably based on document source.

Delegation

- [KRS 156.501](#) requires delegation of nursing functions to be consistent with administrative regulation promulgated by the Kentucky Board of Nursing (KBN). The following discussion of nursing law is excerpted from KBN's AOS #87-15 Advisory Opinions Statement: "Role of Nurses in the Supervision and

Delegation of Nursing Acts to Unlicensed Personnel⁽¹⁴⁾

- [KRS 314.021](#) (2) holds all nurses responsible and accountable for making decisions that are based upon the individual's education preparation and experience in nursing
- [KRS 314.011](#) (2) defines "delegation" as: "...Directing a competent person to perform a selected situation under the nurse's supervision and pursuant to administrative regulations promulgated by the board in accordance with the provisions of [KRS Chapter 13A](#)
- [201 KAR 20:400](#) governs delegation of nursing tasks to unlicensed persons including definitions, nursing responsibility in delegation, criteria for delegation and supervision of unlicensed person
- [KRS 314.031](#) (1) states: "It shall be unlawful for any person to call or hold himself out as or use the title of nurse or to practice or offer to practice as a nurse unless licensed under the provision of this chapter."
- [KRS 314.011](#) (6) defines "registered nursing practice as: the performance of acts requiring substantial specialized knowledge, judgment, and nursing skill based upon the principles of psychological, biological, physical and social sciences in the application of the nursing process
- [KRS 314.011](#) (10) defines "licensed practical nursing practice "as...the performance of acts requiring knowledge and skill such as are taught or acquired in approved schools for practical nursing in: a) the observing and caring for the ill injured, or infirm under the direction of a registered nurse, a licensed physician or dentist
- [KRS 314.011](#) (13) "nursing assistance" means the performance of delegated nursing acts by unlicensed nursing personnel for compensation under the supervision of a nurse

All statutes, regulations and KBN opinions can be found in their entirety in the reference guide Appendix.

School boards, superintendents, principals, and other school administrators (including FRYSCs) who have hired non-medical/unlicensed staff to provide health services, need to be aware that only a physician, advanced registered nurse practitioner (ARNP), or registered nurse (RN) can delegate such health services and are to do within that professions' scope of practice. Limited delegation under the direct supervision of an RN is within the licensed practical nurse's (LPN) scope of practice. [Exhibit 2F](#) illustrates a list of potential health care services that may be delegated to unlicensed (or non-medical) staff/para-professionals.

Training

[KRS 156.501](#) (1) requires training of designated non-medical school personnel.

[KRS 156.502](#) (2) governs who can provide health care services in a school setting. Subsection (c) reads:

A school employee who is delegated responsibility to perform the health service by a physician, advanced registered nurse practitioner, or registered nurse; and (1) has been trained by the delegation physician or delegating nurse for the specific health service within his/her scope of practice...and (2) has been approved in writing by the delegation physician or delegation nurse.⁽²⁾

The school nurse should be included in the selection and evaluation process for the nonmedical/unlicensed employee. If delegating employees (licensed and unlicensed) are to perform health services for students, the nurse

should present a clear plan that includes an appropriate job description for that employee. All employees should receive adequate orientation and supervision and periodic evaluations. Training for employees should identify expectations and limitation of the employees' role. Delegation and training on specific health service procedures are included later in this guide.

The delegating physician or delegating nurse must document training of the employee providing the health service. Questions to consider when planning a training session are illustrated in [Exhibit 2G](#). A sample training form (courtesy of Jefferson County Public Schools) is illustrated in [Exhibit 2H](#).

HEALTH SERVICES FOR STUDENTS AND EMPLOYEES

	School Nurse	Nurse Assistant	Volunteer
First Aid (illness/injury)	X	X*	X*
Health appraisal	X		
Mandated screening (vision, hearing, scoliosis)	X	X	
Immunization monitoring	X	X*	
Administration of prescribed medication	X	X*	
Pediculosis screening and treatment	X	X*	
Special procedures (clean intermittent catheterization, tube feeding, tracheostomy suction, etc.)			
Teaching	X		
Monitoring	X		
Service delivery	X	X*	
Pregnancy case management	X		
Drug toxicity assessment	X		
Management of communicable diseases	X**		
Individual health counseling	X**		
Referral of medical problems	X		
Follow-up of referred medical problems	X		
Participation on the Assistance and Consultation team (ACT)	X		

*With training, if state law allows this function to be delegated.

** Includes employees

QUESTIONS TO CONSIDER

When planning the delegation training, keep the following questions in mind:

Who's your audience? When training non-medical employees, it is important to remember they may be unfamiliar with medical terminology.

What are you training? Keep the information simple and provide the information in writing for easy reference.

How much time do you have to train? Schedule enough time to cover the material effectively.

Where are you training? Teaching materials (PowerPoint, overhead, video) may vary depending on the training site's space availability.

Why is the training necessary? Explain the importance of delegation.

DELEGATION OF HEALTH SERVICE(S) TO SCHOOL PERSONNEL

School Year: _____ Date: _____

Employee Printed Name _____

School: _____

I have been instructed on my school district's guidelines for:

Employee Initials	Health Services Nurse's Initials	
		Administration of medications on daily basis and field trips
		Administration of medication on field trips only
		Asthma and Mini-nebulizer treatments
		Diabetes and blood glucose monitoring
		Epi-pen
		G-tube feedings
		G-tube medication administration
		Seizure and Diastat
		Trachs and suctioning

I understand that I am to follow district guidelines as delegated by the school nurse. Upon signing this, I consent to perform the health service(s) initialed above by the delegating school nurse and myself, possess the training and skills, and have demonstrated competency to safely and effectively perform the health service(s).

Employee Signature

Date

I have provided training to this individual on the health service(s) initialed above by the employee and myself in accordance with school district guidelines. She/he has demonstrated knowledge and understanding of this/these health service(s).

School Nurse Stamp/Signature

Date